

MARK C. HARDEE #6-4137
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA)	
)	
Plaintiff)	
)	
vs)	Case No: 1:23-cr-00031-ABJ
)	
CHRISTOPHER BAKER)	
)	
Defendant)	

MOTION FOR APPOINTMENT OF EXPERT IN BIOMEDICAL SCIENCES

COMES NOW, the Defendant, by and through his counsel, Mark C. Hardee, and in his Motion for Appointment of Expert in Biomedical Sciences does allege and state:

1. The Defendant has been indicted for violations of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), Distribution of Fentanyl Resulting in Death, Distribution of Fentanyl Resulting in Serious Bodily Injury, and Distribution of Fentanyl.
2. That Counsel for the Defendant is currently in the process of investigating the facts and circumstances of the case including investigative reports and analysis.
3. That Counsel for the Defendant has determined that a forensic expert is required to independently evaluate certain evidence in the case, and that such expert is essential for an effective defense against the indictment.
4. That Counsel for the Defendant has contacted Olen R. Brown, Expert in Biomedical Sciences, and believes that Mr. Brown is qualified and able to provide the necessary expert analysis. Mr. Brown has agreed to provide the necessary services at the following rates:

- a. Consulting: \$360.00 per hour.
- b. Deposition and Trial Testimony: \$420 per hour

5. That it is necessary for Counsel for the Defendant to provide relevant documents from the discovery file to the expert for independent analysis.

WHEREFORE the Defendant prays for the following:

1. That the Court grant the appointment of Olen R. Brown as forensic expert for the Defendant at the following rates:

- a. Consulting: \$360.00 per hour.
- b. Deposition and Trial Testimony: \$420 per hour

2. That the Court grant Counsel for the Defendant authority to reproduce relevant documents from discovery and provide them to the forensic expert as necessary.

3. That the Court decree such other additional and further relief as the Court deems just and equitable.

DATED this 28th day of July, 2023.

CHRISTOPHER BAKER

BY

/s/ Mark C. Hardee
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CERTIFICATE OF SERVICE

I Mark C. Hardee certify that a true and correct copy of the foregoing Motion has been forwarded to Kerry Jacobson, Asst U.S. Attorney, via electronic filing, on this 28th day of July, 2023.

/s/ Mark C. Hardee
Mark C. Hardee